

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Chapter 13
	:	
THOMAS WARING	:	5/31/2022 10:00 A.M.
LEE ANNE WARING	:	4 th Floor Courtroom
	:	
	:	Case No. 21-10374

**ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY**

1. Admitted.
2. Admitted
3. Admitted.
4. Denied.
5. Denied.
6. Denied. Debtors deny that they have failed to make the stated payments as listed and avers that Movant is holding payment(s) in abeyance without crediting their account. However, if debtors have missed any payments, they wish to enter into a stipulation allowing them to repay any post-petition arrearages through the remainder of their Chapter 13 plan.
7. Denied.
8. Denied.
9. Denied.
10. Admitted.

WHEREFORE, it is requested that this Honorable Court DENY and DISMISS movant's Motion for Relief from the Automatic Stay, or in the alternative approve a stipulation permitting the Debtors to become current on any missed post-petition payments.

Respectfully Submitted,

YOUNG, MARR & ASSOCIATES

By: /s/Paul H. Young
Paul H. Young, Esquire
Attorney for Debtors
3554 Hulmeville Road, Suite 102
Bensalem, PA 19020
P: 215-639-5297
F: 215-639-1344
support@ymalaw.com